

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 09-100 (ADM/JJG)

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	GOVERNMENT'S MOTION
	)	IN LIMINE TO ADMIT
v.	)	OTHER BAD ACT EVIDENCE
	)	UNDER RULE 404 (b)
ROBERT DALE GORIS,	)	
	)	
Defendant.	)	

The United States of America, by and through its attorneys, B. Todd Jones, United States Attorney for the District of Minnesota, and Michael L. Cheever and Kimberly A. Svendsen, Assistant United States Attorneys, hereby moves the Court in limine to admit the following evidence at trial, pursuant to Rule 404(b) of the Federal Rules of Evidence, relating to the defendant's efforts to hide his income and assets and to prevent creditors, including the Internal Revenue Service, from being able to seize such income and assets, as follows:

1. The defendant's use of Bought With A Price Ministries, a corporation sole, beginning in 2004;
2. The defendant's attempt to place a one hundred billion dollar (\$100,000,000,000) lien on his own property in May 2005; and
3. The defendant's use of two trusts, Land Trust and Transport Trust, to hide his assets and income with the assistance of Shawn Rice beginning in June 2005.

This motion is based upon the files, records, and proceedings

in the above-referenced action and on the Government's Trial Memorandum, which is submitted in support of this motion.

Dated: February 18, 2010

Respectfully Submitted,

B. TODD JONES  
United States Attorney

s/Michael L. Cheever  
BY: MICHAEL L. CHEEVER  
Assistant U.S. Attorney  
Attorney ID No. 192582

s/Kimberly A. Svendsen  
BY: KIMBERLY A. SVENDSEN  
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